



United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
CCC#:  
DATE FILED: 12/4/19

MEMO ENDORSED

December 4, 2019

**BY EMAIL AND ECF**

The Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Gonzalo Enrique Botero Saenz, et al.  
16 Cr. 136 (CM)

12/4/19  
Matter adj. to 1/9/20  
at 3:15 - time excluded  
through 1/9, in the interest  
of justice, to facilitate  
plea discussions.  
Colleen McMahon

Dear Judge McMahon:

The parties write jointly to request an adjournment of the status conference currently scheduled in this matter for December 5, 2019. The parties are engaged in productive plea discussions and, based on the current status of those negotiations, believe there is a strong possibility that they will seek to schedule a change of plea hearing in the coming days. Accordingly, the parties respectfully requests that the Court adjourn the December 5 status conference for approximately thirty days so that the parties can appear in Court next month in the event that the current plea discussions do not result in a resolution of the case in the near term.

In addition, the Government respectfully requests that, for the foregoing reasons, the Court exclude time under the Speedy Trial Act until the date of the next conference as such an exclusion would be in the interests of justice. Defense counsel consents to this request.

Very truly yours,

GEOFFREY S. BERMAN  
United States Attorney

By: /S/  
Andrew DeFilippis  
Assistant United States Attorney  
(212) 637-2231

cc: Valerie Gotlib, Esq. (via email)